

**IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
TEXAS**

CHRIS SEVIER V. GREG ABBOTT, in his official capacity as Governor of Texas; KEN PAXTON, in his official capacity as Attorney General of Texas; and CHRIS DANIEL, in his official capacity as Clerk of Harris County Clerk,	Case No: 4:16-cv-00347 The Honorable Alfred H Bennett COMPLAINT FOR INJUNCTIVE RELIEF JURY DEMAND
---	--

MOTION FOR RECONSIDERATION BASED ON TOTAL ABUSE OF DISCRETION

NOW COMES, “this man,” Chris Sevier, seeking reconsideration under rule 59 of the Federal Rules of Civil Procedure.¹ “This man” asks to marry an inanimate object in step with his “personal choice,” “existing right,” “fundamental right,” and “individual right.”² “This man” is a former Judge Advocate, combat infantry officer, veteran of OIF rule of law mission, and prosecutor for the United States, who has a zero tolerance policy regarding Judges who abuse the

¹ The Court refers to the Plaintiff as “this man” in its order in which it recklessly denied the Plaintiff’s request to proceed without fees in total contempt for the District Court in Utah that just found the opposite. If the Court is morally turned off by the Plaintiff’s request to marry an inanimate object, it should recuse itself.

² The Supreme Court has reaffirmed at least fourteen times that the right to marry is one of the most individual and fundamental rights—if not the most fundamental right— of an individual. *Loving v. Virginia*, 388 U.S. 1, 12 (1967)(The Court was referring to traditional marriage in each case but that does not matter because it does not). The Court has defined marriage as a right of liberty (*Zablocki v. Redhail*, 434 U.S. 374 (1978), privacy (*Griswold v. Connecticut*, 381 U.S. 479 (1965), intimate choice (*Lawrence v. Texas*, 539 U.S. 558 (2003), and association (*M.L.B. v. S.L.J.*, 519 U.S. 102 (1996). Marriage is “a coming together, for better or for worse, hopefully enduring, and intimate to the degree of being sacred.” *Griswold*, 381 U.S. at 486. It is “the most important relation in life” and “is of fundamental importance for all individuals.” *Zablocki*, 434 U.S. at 384 (internal quotation marks omitted); see also *Cleveland Bd. of Educ. v. LaFleur*, 414 U.S. 632 (1974). The Supreme Court has also repeatedly reaffirmed that “[c]hoices about marriage” are “sheltered by the Fourteenth Amendment against the State’s unwarranted usurpation, disregard, or disrespect.” *M.L.B.*, 519 U.S. at 116; see also *Planned Parenthood of S.E. Pa. v. Casey*, 505 U.S. 833, 848 (1992) (marriage is “an aspect of liberty protected against state interference by the substantive component of the Due Process Clause”). In light of this history, the district court recognized that “[t]here can be no serious doubt that in America[,] the right to marry is a rigorously protected fundamental right.” JA 365.

law he and his fellow Soldiers defend. “This man” is interfacing with the Senate Judiciary committee, like Senators Hatch, Lee, Cruz, ect. for good cause, regarding how Courts respond to his action to include Judge Bennett. “This man” has revived *Obergefell v. Hodge*, 192 L. Ed. 2d 609 (2015) where Justice Scalia said that relativistic judges are a threat to Democracy, which raises the question whether the Justice assigned here is part of that threat to Democracy.³ “This man” has filed or is in the process of filing at the very least 12 lawsuits of this nature in all 12 federal circuits in order to give the Judiciary the opportunity to bother to honor the rule of law. “This man” has filed an action where there is a question whether or not the judiciary has hijacked the Constitution in step with a malicious goal to advance what amounts to a caliphate of relativism in step with liberal fascism that is as great of a threat to National Security interest as jihadist seeking to impose its version of moral superiority on the United States through a series of power plays. The Court floated its order after the Plaintiff had presented an unopposed motion. Clearly, the Court cannot try to now limit the Plaintiff’s page number because his response in opposition to the State’s reckless motion to dismiss is persuasive. The Court is overtly either - not thinking - or more likely, deliberately trying to stifle the Plaintiff’s speech because he finds man-man marriage perfectly acceptable but man-machine marriage morally offensive. The Fifth Circuit in *Deleon v. Abbott*, 791 F3d 619 (5th Cir 2015) made it crystal clear in its final order that for the state or federal actors to limit marriage on the basis of morality is totally invalid. The Court cannot interject its set of morality into this action by now trying to limit the Plaintiff’s page number in responding to the State because it finds his current response insurmountably persuasive, and it is. The Court should stay the hell out of the fighting, pretend

³ Justice Scalia did not stutter when he offered that position, and the Plaintiff’s eyebrows are raised.

to be an neutral umpire, and allow the state and the Plaintiff to slug it out. As a former Judge Advocate, who gives advice to Judges professionally, this would be the free legal advice that he is providing to Judge Bennett in a conversy that can only be characterized as acrimonious given the amount of persecution taking place at the hands of judicial recklessness.

The Plaintiff would like the Court to have no delusion that he is as equally putting the Court on trial as he is Governor Abbott for good reason. No man is about the law - including life time appointed Judges who push liberal fascism. The Plaintiff will be submitting a report to the Senate Judiciary committee regarding every decision made by the District Courts and Magistrates, who are merely engaging in establishment politics by defending a status quo that absolute offends the rule of law in its current condition.⁴ The Plaintiff's request is far more in touch with reality than a man's request to marry a man and call him his wife. The Plaintiff does not dispute that "whether man-man marriage and man-machine marriage is moral or not matters." It does. But man-man marriage is literally creating a public health crisis as transgender and gays seek to use member of the opposite sex bathrooms. The Plaintiff, as a machinist, who is a male, does not make such a request and will relegate his use of the toilet to the men's room, since he is a male and since his inanimate object has more female like sex parts than male ones.⁵

Governor Abbott and Attorney General Paxton have appeared in this action and so far made arguments to defend the plausibility of same-sex marriage making the same impeached and inferior arguments that they made in attacking it just months ago. They have managed to make a 180 on their position that same-sex marriage is wrong. That development is more than "news

⁴ To use Donald Trumps words, people are going to get "fired."

⁵ The Plaintiff will be asking the Senate Judiciary committee to all but urinate on abusive decisions floated by the Court as an extension of animus, bad faith, abuse of discretion, and disregard for the rule of law.

worthy,” it demonstrates a lack of integrity, character, and fitness problem. The Plaintiff will now not only ask the media in Texas to cover down on the state’s reversal because of its inability to come up with compelling interests on top of adding the fact that Judge Bennett presents a danger to these proceedings by interjecting in a manner that will stifle speech because he has a pre determined agenda in mind.

The Court should be mindful that the Plaintiff provided the Court’s order in Utah that allowed him to proceed without paying the fees. Inconsistent decisions in this action by the District Court will be of immense interest to judicial oversight committees for good cause. Let’s remember that the question of whether the court is a threat to democracy is on the table in the big things and in the small.

Furthermore, the funds paid out to the Plaintiff from the Federal Government are protected, they are not designed to be used for court fees whatsoever. They are protected from garnishment, child support, ect. Moreover, pending now is a response from the Plaintiff that is approximately 56 pages. It is an adequate and appropriate response to the Defendant’s reckless motion to dismiss in a case of first impression regarding sex matters. More than that the Plaintiff’s filed response to the motion to dismiss unequivocally pins both the Court and the Governor to the metaphorical wall in making both provide him with the relief he has demanded in step with his fundamental due process and equal protection rights. Let’s not pretend that this is not a war. It is, and until Judge Bennett bothers to go overseas and risk its life for the rule of law in a manner where the Judge himself could come home under a flag, the Plaintiff respectfully asks that this Court in Texas at no time molest his Constitutionally protected rights in a sex case due to what amounts to a refusal to think and an inability to restrain oneself from

demonstrating bias in a manner of incredible arrogance. The Court is to be a slave to the Constitution, and not a slave to the unexamined assumption of the superiority of our cultural moment. Just as the Nazi culture was wrong in cultivating holocaust against the Jews, American culture has managed to cultivate a sexual holocaust where child exploitation, human trafficking, and false permission giving beliefs are rampant. Dr. King talked a lot about darkness in his efforts to fight segregation, the United States is in a persistent state of darkness in the area of sex and the Judges in this Country are likely the most deluded of all. Judge Bennett should at the very least try to demonstrate otherwise by staying out of the way and allowing the parties to litigate these matters. Currently, the Plaintiff is going to publicly accuse Judge Bennett of trying to stifle speech in these matters to publications like the Houston Chron. Cases like this are not tried in a vacuum.

The Plaintiff would remind the District Court Judge, who is an African American, that the integrity of the civil rights movement is under attack. The Plaintiff has appeared as an advocate for protecting the integrity of Dr. King and his efforts⁶. This is not a matter for the Court to play games and by into liberal narratives predicated on the ends justifying the means because of go along get along mentality that warrants rectifying if Senator Cruz wins the general in November 2016. Make no mistake, there will be a purge of the Judiciary.

If all of the countless courts that the Plaintiff is appearing before made him pay the filing fee out of wounded warrior funds, he would owe thousands of dollars in fees. It is not the Plaintiff's fault that he feels compelled to exercise his fundamental right to travel and file

⁶ In the pornography cases, many publications have equated the Plaintiff to a Rosa Parkers of sorts. "This man is the Rosa Parks of porn."
<http://www.digitaltrends.com/opinion/overly-litigious-society-reaches-its-climax-as-man-sues-apple-for-porn-addiction/>

lawsuits to ensure that his civil rights are protected. It is the Judiciaries fault. And the Plaintiff expects Judge Bennett to proceed with immense humility.

Let's be clear - let's live in reality - the same-sex marriage decision was predicated on immense arrogance and a refusal to think that has lead to lunacy and persecution. It has absolutely led to the persecution of Christians and of course to those of us in the true minority of sexual orientation, like the Plaintiff, have been relegated to fourth class citizens. Judge Bennett cannot be indifferent to that because it is inconvenient for him to face real controversy and do his duty. The Plaintiff has a zero tolerance policy for their the Court or the Attorney General, who want to engage in even the slightest amount of dereliction of duty. The Plaintiff asks the Court to accept the response to the state's motion to dismiss as is. It was filed before the Court fired off its order demanding that the Plaintiff's words be limited to the 20 page restriction.

The Plaintiff asks that the Court grant his motion to allow all sides permission to file up to three times the jurisdictional limit. Failure to grant that motion, when all motions for extended filings were granted by the Court in the *Deleon v. Perry* action, will be per se evidence of Judicial activism and bias that will be added to the pile of cases that impeach *Obergefell* and *Windsor*.⁷ Just because the Court and state do not want the Plaintiff to be persuasive because he is a poor non-lawyer who has appeared as an agent of the unpopular sexual orientated class, does not spare them from having to follow the law.⁸

⁷ The Court best pray that the media is an advocate for liberal fascism and will support double standards and bias in this matter so that an enclosed self-circulating system of lawlessness is perpetuated.

⁸ This is an exceptional case where the Court's integrity is absolutely in question. The public's health is more important than Judge Bennett's entitlement and sentimental feelings. No safe space will be afforded by the former combat officer turned Plaintiff. The Court cannot pretend that it is not due to some imperialistic judicial laziness that basically amounts to a refusal to come to terms with reality and the harmful secondary consequences that stem from our government's getting decisions wrong in the area of sex.

The state can argue that it has a compelling interest for the definition of marriage to reverted back. Yet, the state cannot ask the Court to allow for the discrimination against the true minority of sexual orientation just because we lack a loud voice in Hollywood. Additionally, the Court should accept the response to the motion to dismiss as is for other reasons.⁹ The Plaintiff is slugging it out with Apple, Google, Samsung, Verizon, Dell, Planned Parenthood, Motorola, Microsoft, LG, ect in before th 6th Circuit Court of Appeals.¹⁰ He is under immensely tight deadlines in cases that defend the integrity of the obscenity statutes, which also is another case in the area of sex. Judge Bennett's efforts to stifle speech in this case cannot also be used to stifle speech in the porn cases because he has some agenda that he thinks is more important than the law. This Court would be wise to immediately reverse itself and to provide the Plaintiff with every single one of his demands, simply because they accord with the law, justice, and common sense. The Plaintiff will otherwise, feed Judge benefit to the media and to the powers that be following the change of administration.¹¹

⁹ The Plaintiff is the last person on the planet that a Court wants to cross - take that at face value. As a Judge Advocate, we have a saying "we kill careers not Soldiers." The Plaintiff has the time and skill to haul any immoral and lawless Judge up to Washington for competency hearings. The intimate relations that the Plaintiff has with senior political advisors on that committee and others is beyond question at this point, given his legislative initiatives pending.

¹⁰ The Plaintiff is has a coalition formed that has appeared in that action. A similar coalition will be appearing here. Even if Judge Bennett does not have respect for the Plaintiff, he better have respect for the coalition members in the google action and the ones that appear here. The Court cannot take up the Plaintiff's time because it is trying to stifle his speech due to its desire to advance what amounts to a caliphate of relativism.

¹¹ Judicial intimidation or shaming will be provided in the Plaintiff's report to the Senate Judiciary committee. The Plaintiff will ask the Texas and National news media outlets to serve as a watchdog over these proceedings for cause. Any attempt to swept these matters under the rug like the Supreme Court did four times in denying the Plaintiff's intervention requests is not going to go without consequence, now that the Plaintiff has filed his own lawsuit. Allow the Plaintiff to spell it out for this Court so there is no ambiguity: if the Court is chaired by a Christian Judge it should mean one thing; if the Court is chaired by a relativist Judge, it will mean another. The Plaintiff is on the side of the truth and the law, he is about 20 steps ahead of this Court and the state. No game playing, fraud, waste, mismanagement, or tyrannical activism is going to go unaddressed. President Obama is on his way out, and any state actor who is engaging in the hijacking of the United States Constitution is going to met with harsh consequence at the hand of the DOJ come January 2017

Military Officers are held to higher disciplinary ethical standards like the court and government actors. All parties present here must act like or risk violating their Constitutional oath. Moreover, the Plaintiff asks the Court to make decisions based off of the law and evidence presented instead of going outside of that to impose an agenda that will absolutely backfire and damage the trustworthiness of Federal Courts at large. Reconsideration is thereby warranted and demanded by this man, Lieutenant Sevier.

Anger is not the opposite of love. Hate is. And the final form of hate is indifference, and the Plaintiff is is not indifferent to the Court making decisions that are downright wrong in the area of sex that opens the door to encouraging our youth to engage in sex acts that are harmful and destructive. The Plaintiff demands that the Court not be indifferent either. If the Court is a liberal fascist like Justice Ginsburg and Kennedy, who has made up his mind to defend the plausibility of same-sex marriage at the expense of traditional married couples and/or the expense of the true minority class, recusal as an act of job self-preservation is recommended by the Judge Advocate.

Furthermore, the Plaintiff is absolutely not an attorney. There is no evidence that he is license to practice law, after sustaining a wound in a foreign theater of war. For the same reason that the Plaintiff does not have a license is the same reason why he should not be required to pay the Court's filing fee. To demand otherwise does amount to a form of service discrediting misconduct on the part of judicial actor that will need to be addressed by the Senate Foreign relations committee and the Senate Armed Services Committee. If the Court finds that the Plaintiff can practice law, he will immediately file lawsuit against the Tennessee Supreme Court

who pretends that he cannot, after he filed a lawsuit against the ethics commission for targeting Christian attorneys.

The Court and State should not have any false illusions as to whether the Plaintiff is meeting with attorney generals, state legislatures, and federal legislatures regarding a litany of matters that associate directly or indirectly with the instant cause of action. The Plaintiff has been injured and demands every opportunity to be healed and made whole again. Judicial interference with the administration of justice will be taken of as ineptness that will be factored into the next series of legislative initiatives that the Plaintiff presents. To be clear, the Plaintiff in this case does not want to be friends with the Court or friends with the state. Both have demonstrated contempt for the law out of the gate due to a jaded refusal to think and see. He will not be floating a litany of irrational emotional appeals to the Court to buy into due to a refusal to think that is nearly mind numbing, like the same-sex marriage litigants did in the past. But the Plaintiff will strictly demand that all of his requests be honored and that he be treated with immense dignity and respect as he seeks to cure his injuries following a rejection by the clerk's office for his marriage request. If the Court is going to be an advocate for lawlessness in this action, he should make that clear now, so the Plaintiff can non-suit and refile in a different District in Texas - demonstrating that Judge Bennett lacks the ability to handle this matter without interfering with justice. That way when he makes his case to the Senate Judiciary committee regarding the need for litigants to "judge shop" in order to find a judge who has wisdom and the rule of law in their bones, he can use poor Judge Bennett here as an example, without relying on a mere hypothetical.

Let's remember that Harris County is the county that is prosecuting the whistle blowers for blew the whistle on Planned Parenthood's baby part scam. If Texas Senator Cruz because President, he has already promised to have the DOJ investigate Planned Parenthood for its murderous factory machine. The Plaintiff, as a former prosecutor for the United States, is also interested in seeking that investigation include all state and federal officials who are advancing relativism under the false guise of good will at the integrity of the law. The probability of the Plaintiff having that request granted is high, just as the probability that one of Judges out of many that the Plaintiff is currently before is going to honor the law and stop overtly trying to stifle his speech, as this Court just did in a dehumanizing, depersonalizing, and reckless manner. The Court needs to have a bit more faith in the capacity of the former Judge Advocate who is appealing to it in this action, as a matter of common sense and equitable necessity. The Court would be wise to stay out of the hell out of the way, do its job, and let the state and the Plaintiff fight it out in step with their resolve to honor the rules of ethics. It is the Plaintiff's apprehension that the Court will not accept the response to the motion to dismiss because the Court wants to stifle his speech because it finds man-machine marriage morally repugnant, but man-man marriage totally acceptable. It is blatantly outrageous, and grounds to provoke judicial oversight due to flagrant discriminatory animus by a Federal actor.

/s/Chris Sevier/
1LT __th Group
(615) 500 4411
9 Music Square South
Nashville, TN 37203
ghostwarsmusic@gmail.com

CERTIFICATE OF SERVICE

The undersigned certifies that on April 11, 2016, the Plaintiff electronically submitted the foregoing document to the clerk of the court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of the court to Kelli C. Fuqua, counsel for

Governor Abbott and Attorney General Paxton, located at 2 Office of the Attorney General
General Litigation Division P.O. Box 12548, Capitol Station Austin, TX 78711-2548, at the
email address on file with the Court's ECF filing system.

/s/Chris Sevier/